

**UNITED STATES DISTRICT COURT
SOUTHERN DISTRICT OF NEW YORK**

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BIRMINGHAM RETIREMENT AND RELIEF
SYSTEM, et al., Individually and on Behalf of All
Others Similarly Situated,

Plaintiffs,

v.

S.A.C. CAPITAL ADVISORS, L.P., et al.,

Defendants.
-----X

No. 13 Civ. 2459 (VM) (KNF)

ECF CASE

**LEAD PLAINTIFFS' NOTICE OF UNOPPOSED MOTION AND MOTION FOR
(i) PRELIMINARY APPROVAL OF SETTLEMENT, (ii) CERTIFICATION OF A
SETTLEMENT CLASS, AND (iii) APPROVAL OF NOTICE**

PLEASE TAKE NOTICE that Plaintiffs City of Birmingham Retirement and Relief System ("Birmingham") and KBC Asset Management NV ("KBC") (collectively, "Wyeth Lead Plaintiffs") on behalf of themselves and the Settlement Class, in the above-captioned action, through counsel, hereby move this Court before the Honorable Victor Marrero, for an order pursuant to Rule 23 of the Federal Rules of Civil Procedure for: (i) preliminary approval of the proposed Settlement embodied in the Stipulation of Settlement dated December 21, 2015 (the "Stipulation"); (ii) certification of the proposed Settlement Class for purposes of the Settlement with the Defendants; (iii) approval of the form and manner of providing notice to putative Settlement Class Members; (iv) the scheduling of a hearing (the "Final Approval Hearing") on final approval of the Settlement and Plaintiffs' Counsel's motion for an award of attorneys' fees and reimbursement of litigation expenses; and (v) such other and further relief as the Court deems just and proper. Defendants do not oppose this Motion.

Respectfully submitted,

Dated: December 23, 2015
New York, New York

MOTLEY RICE LLC

By: /s/ Gregg S. Levin
Gregg S. Levin
David P. Abel
28 Bridgeside Blvd.
Mount Pleasant, SC 29464
Tel: (843) 216-9000
glevin@motleyrice.com
dabel@motleyrice.com

-and-

William H. Narwold
One Corporate Center
20 Church St., 17th Floor
Hartford, CT 06103
Tel: (860) 882-1676
bnarwold@motleyrice.com

*Lead Counsel and Counsel for Wyeth Lead
Plaintiffs Birmingham Retirement and Relief
System and KBC Asset Management NV*

SCOTT + SCOTT,
ATTORNEYS AT LAW, LLP

By: /s/ Deborah Clark-Weintraub
Deborah Clark-Weintraub
Max R. Schwartz
Thomas L. Laughlin
The Chrysler Building
405 Lexington Avenue, 40th Floor
New York, NY 10174
Tel: (212) 223-6444
dweintraub@scott-scott.com
mschwartz@scott-scott.com
tlaughlin@scott-scott.com

*Lead Counsel and Counsel for Wyeth Lead
Plaintiffs Birmingham Retirement and Relief
System and KBC Asset Management NV*

- All Wyeth Lead Plaintiffs' counsel consent to the use of their electronic signatures. -